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BELLSOUTH TELECOMMUNICATIONS, INC.
DIRECT TESTIMONY OF DAVID P. SCOLLARD
BEFORE THE TENNESSEE REGULATORY AUTHORITY
DOCKET NO. 97-00309
APRIL 26, 2002

Q. PLEASE STATE YOUR NAME, ADDRESS, AND POSITION WITH
BELLSOUTH TELECOMMUNICATIONS, INC.

A. I am David P. Scollard, Room 28A1, 600 N. 19th St., Birmingham, AL 35203. My
current title is Manager, Wholesale Billing at BellSouth Billing, Inc. (BBI), a wholly
owned subsidiary of BellSouth Telecommunications, Inc. ("BellSouth"). In that role,
I am responsible for overseeing the implementation of various changes to BellSouth's
Customer Records Information System (CRIS) and Carrier Access Billing System
(CABS).

Q. PLEASE SUMMARIZE YOUR BACKGROUND AND EXPERIENCE.

A. I graduated from Auburn University with a Bachelor of Science Degree in
Mathematics in 1983. I began my career at BellSouth as a Systems Analyst within
the Information Technology Department with responsibility for developing
applications supporting the Finance organization. I have served in a number of billing
system design and billing operations roles within the billing organization. Since I
assumed my present responsibilities, I have overseen the progress of a number of
billing system revision projects such as the billing of unbundled network elements

1 (UNEs), as well as the development of billing solutions in support of new products
2 offered to end user customers. I am familiar with the billing services provided by
3 BellSouth to local competitors, interexchange carriers (IXCs) and retail end user
4 customers.

5

6 Q. HAVE YOU TESTIFIED PREVIOUSLY BEFORE ANY STATE PUBLIC
7 SERVICE COMMISSION? IF SO, BRIEFLY DESCRIBE THE SUBJECT OF
8 YOUR TESTIMONY.

9

10 A. I have testified before the state public service commissions in South Carolina,
11 Florida, Georgia, Kentucky, Louisiana, Mississippi, South Carolina, the Tennessee
12 Regulatory Authority, and the Utilities Commission in North Carolina on issues
13 regarding the capabilities of the systems used by BellSouth to bill for services
14 provided to retail customers, IXCs and Competitive Local Exchange Carriers
15 (CLECs).

16

17 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY IN THIS PROCEEDING?

18

19 A. The purpose of my testimony is to address two requirements of Checklist Item 6 –
20 namely, the obligation to provide usage information for billing exchange access and
21 the obligation to provide usage information for billing for reciprocal compensation.
22 See SWBT-Texas Order at ¶ 339; Second Louisiana Order, at ¶ 230-231.
23 BellSouth is in compliance with both of these obligations.

24

25

1 Q. PLEASE SUMMARIZE WHAT THE FCC SAID ABOUT BELL SOUTH'S
2 BILLING FUNCTIONS IN ITS SECOND LOUISIANA 271 ORDER.

3
4 A. In its decision in the Second Louisiana Order, the Commission noted that BellSouth
5 had made significant improvements to its Operation Support Systems ("OSS"),
6 which includes billing functions. See id. at 20657, ¶ 91. Despite this, the
7 Commission expressed two concerns with BellSouth's billing processes, as they
8 relate to Checklist Item 6 – Unbundled Local Switching. As I explain, both of these
9 concerns have been fully addressed in this application.

10 Q. WHAT WAS THE COMMISSION'S FIRST CONCERN?

11
12 A. The Commission suggested that BellSouth failed to demonstrate that it was providing
13 CLECs with usage information necessary to bill IXC's for exchange access. See id.
14 at 20733-34, ¶ 230 BellSouth now provides CLECs with the Access Daily Usage
15 File (ADUF), which contains records for billing interstate and intrastate access
16 charges (whether the call was handled by BellSouth or an interexchange carrier) to
17 other LECs and interexchange carriers for calls originating from and terminating to
18 unbundled switch ports. Thus, the ADUF fully resolves the Commission's concerns
19 with respect to this issue. See id. at 20734-35, ¶ 231.

20 Q. PLEASE DISCUSS THE COMMISSION'S SECOND CONCERN.

21
22 A. The Commission also noted that BellSouth was not providing CLECs with data
23 necessary to bill for reciprocal compensation or, alternatively, was not providing
24 CLECs with a surrogate for that data. See id. at 20735-36, ¶ 232. BellSouth has
25 responded to this concern by providing CLECs with the ADUF, which contains
records for billing reciprocal compensation charges to other LECs and interexchange

1 carriers for calls originating from and terminating to unbundled switch ports.
2 Because the BellSouth network does not have the capability to record a terminating
3 call record where an end user served out of a BellSouth switch places a call to a
4 CLEC's unbundled switch port, BellSouth does not provide actual terminating usage
5 data in this situation. Instead, as contemplated by the Second Louisiana Order, in
6 that circumstance BellSouth provides either "a reasonable surrogate or agreed upon
7 arrangement." Id. at 20736, ¶ 233. CLECs have repeatedly agreed that reciprocal
8 compensation data is unnecessary in this context because the UNE charges that
9 would be paid by the CLEC to BellSouth offset the reciprocal compensation charges
10 collected for the same calls. This is because the end office switching rate a CLEC
11 would pay to BellSouth is the same as the switching component of the reciprocal
12 compensation rate BellSouth would pay the CLEC for terminating the call using the
13 end office port. This netting results in each party recovering its costs and alleviates
14 the need for BellSouth to incur the tremendous costs required to begin recording the
15 calls. Interconnection agreements negotiated with a number of CLECs contain
16 references to the call flows that describe this principle and BellSouth has not
17 received any objections from CLECs to this arrangement. Exhibit DPS-1 to this
18 testimony includes the call flows for these types of calls. Where BellSouth's
19 switches are capable of recording calls terminating to the local switching service (i.e.,
20 calls originating from a facility-based CLEC) the surrogate is not needed and
21 BellSouth treats these calls in the same manner as it treats access calls by providing
22 the call record on the ADUF.

23 Q. WOULD YOU PLEASE SUMMARIZE YOUR TESTIMONY?

24 A. Yes. BellSouth now provides CLECs the necessary billing information via the daily
25 usage file products to enable the CLECs to bill access and reciprocal compensation

1 in substantially the same time and manner as BellSouth bills its own retail and access
2 customers.

3

4 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

5

6 A. Yes.

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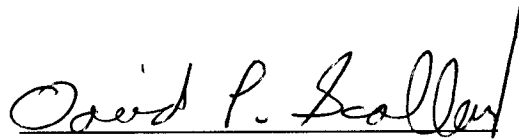
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AFFIDAVIT

STATE OF: Alabama
COUNTY OF: Jefferson

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared David P. Scollard –Manager- Wholesale Billing, BellSouth Billing Inc., who, being by me first duly sworn deposed and said that:

He is appearing as a witness before the Tennessee Regulatory Authority in Docket No. 97-00309 on behalf of BellSouth Telecommunications, Inc., and if present before the Authority and duly sworn, his testimony would be set forth in the annexed testimony consisting of 5 pages and 1 exhibit(s).



David P. Scollard

Sworn to and subscribed
before me on April 19, 2002


NOTARY PUBLIC

NOTARY PUBLIC STATE OF ALABAMA AT LARGE
MY COMMISSION EXPIRES: Dec 28, 2004
BONDED THRU NOTARY PUBLIC UNDERWRITERS

EXHIBIT NO. DPS-1
UNE PORT/LOOP SWITCHED COMBINATION
BILLING ARRANGEMENTS

5. *BST Network - Calling Within a 7 and 10 Digit Dialing Scope Interoffice*



Usage Recordings

indicates demarcation between UNE
Network and other Networks

- ULS-LP (loop and port monthly)
- 2 ULS-SFs (unbundled switching -
originating and terminating, summarized
at originating EO A)
- 2 ULS-TPs (end office trunk ports)
- UIT-S (unbundled transport-shared, fixed and
per mile, mileage calculated from EO A to EO B)
- UTS-SF (unbundled melded tandem switching)
- 2 UTS-TPs (melded tandem trunk ports)

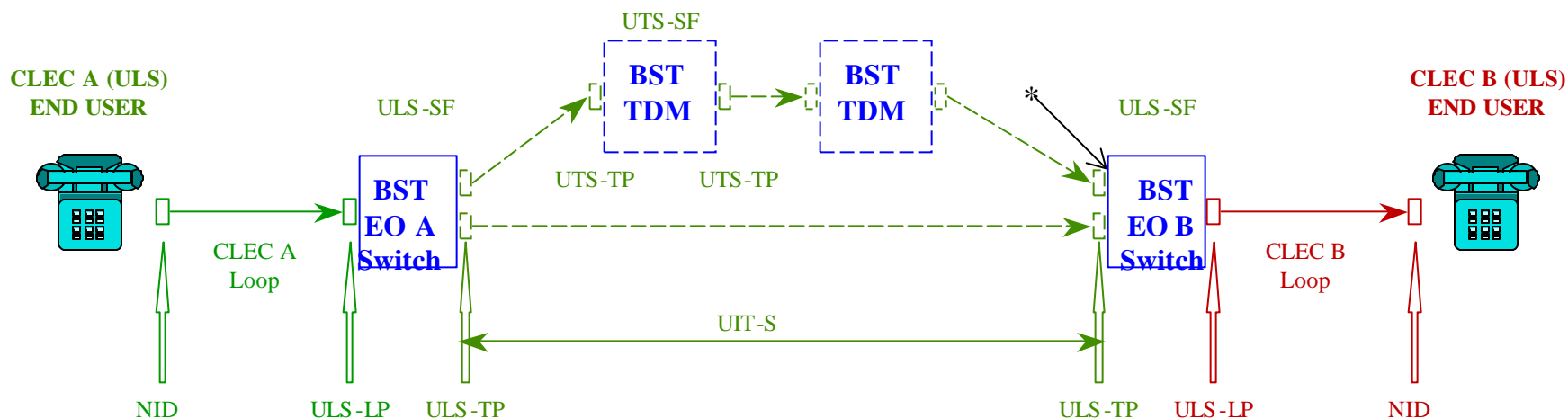
BST bills CLEC A Unbundled Local Switching as indicated above.

Record Exchange

BellSouth sends CLEC A ODUF 10-01-31
(See Local/Toll Exceptions)

UNE PORT/LOOP SWITCHED COMBINATION BILLING ARRANGEMENTS

6. BST Network - Calling Within a 7 and 10 Digit Dialing Scope Interoffice



Billing Concept

-- Unbundled Network Elements

Usage Recordings

-- Call Code 00/072 (NOT MBI13) or Call Code 006/072 is made at the End Office. No tandem indicator, no access time, no attempts. No term recording.
-- Normal EO recordings appropriate to the type of service will be made.

NOTE: Call code 006 records are related to ELCA plans.

BST bills CLEC A

-- ULS-LP (loop and port monthly)
-- 2 ULS-SFs (unbundled switching - originating and terminating, summarized at EO A)
-- 2 ULS-TPs (end office trunk ports)
-- UIT-S (unbundled transport - shared, fixed and per mil, mileage from EO A to EO B)
-- UTS-SF (unbundled melded tandem switching)
-- 2 UTS-TPs (melded tandem trunk ports)

BST bills CLEC B

-- ULS-LP (loop and port monthly)

Billing Factors

-- NA

Record Exchange

BellSouth sends CLEC A ODUF 10-01-31
(See Local/Toll Exceptions)

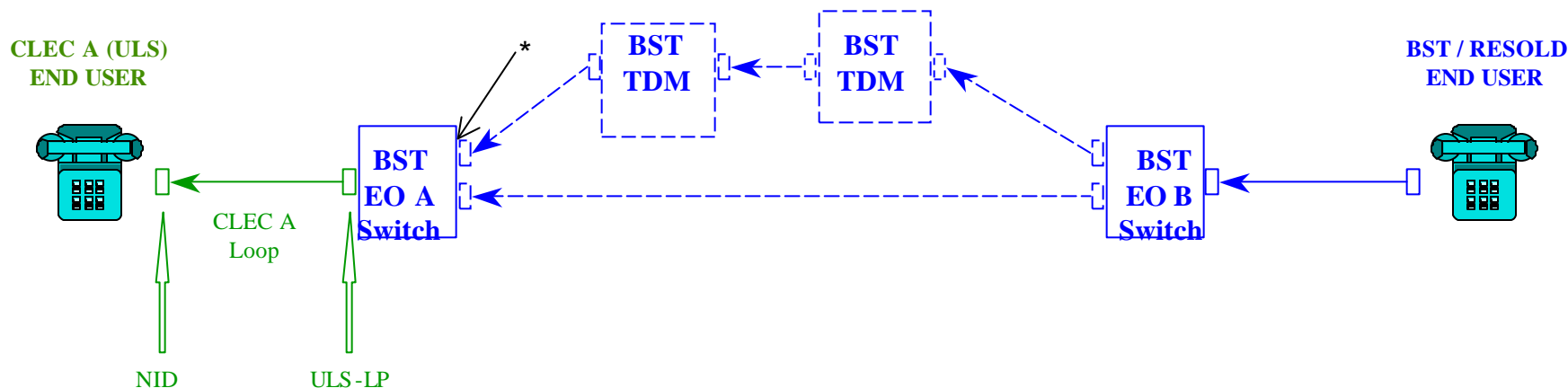
indicates demarcation between UNE Network and other Networks

Note: Since terminating switching and reciprocal compensation are equal:

1. CLEC B does not pay BST for terminating switching and does not receive reciprocal compensation from CLEC A, since they net to zero.
2. CLEC A pays terminating switching to BST instead of paying reciprocal compensation to CLEC B.
3. BST does not have to provide the recording to CLEC B that it would need to bill CLEC A for reciprocal compensation

UNE PORT/LOOP SWITCHED COMBINATION BILLING ARRANGEMENTS

11. BST Network - Calling Within a 7 and 10 Digit Dialing Scope Interoffice



Billing Concept

-- Unbundled Network Elements

BST bills CLEC A

-- ULS-LP (loop and port monthly)

Billing Factors

-- NA

Record Exchange

-- NA

Usage Recordings

-- Call Code 001/072 (NOT MBI13) or Call Code 006/072

is made at the End Office B. No tandem indicator,
no access time, no attempts. No term recording

Note this is MBI13 if the BST end user has flat-rated
service.

-- Normal EO recordings appropriate
to the type of service will be made.

NOTE: Call code 006 records are related to ELCA plans.

Reciprocal Compensation

CLEC A does not charge BellSouth reciprocal compensation as the charges that UNE CLEC A may be entitled to charge BellSouth for terminating local switching would be the same as the charges BellSouth would charge UNE CLEC A for unbundled switching. Such charges would net to zero, since they are the same rate. Therefore, neither Party charges for the unbundled local switching functionality.

indicates demarcation between UNE
Network and other Networks

